



January 2, 2025

700 Grand Apartments, LLC
c/o: Mr. Tyler Sheeran
2501 Parameter Street, Ste. 300B
Middleton, WI 53562
Via Email Only to t.sheeran@commonwealthco.net

Subject: Site Investigation Work Plan Review
Grand Ave Vacant Parcels
700, 804, 806, 810, 814, and 816 Grand Avenue, Wausau, WI 54403
BRRTS #02-37-595786, FID #737263340

Dear Mr. Kessler:

On November 20, 2024, the Wisconsin Department of Natural Resources (DNR) received a site investigation work plan (SIWP), dated November 14, 2024, prepared by Fehr Graham Engineering & Environmental (Fehr Graham) on your behalf for the site identified above. The SIWP was submitted with a technical assistance request fee, in accordance with Wis. Admin. Code § NR 749.04(1), for DNR review and written response. The DNR has reviewed the SIWP for regulatory compliance with Wis. Admin. Code ch. NR 716 and provides conceptual approval of the SIWP with feedback, as outlined below.

Background

The site consists of five parcels totaling 1.13 acres and is currently owned by the City of Wausau. The site was historically vacant until approximately 1950 when the site was developed with a mix of residential dwellings and small-commercial businesses, including a gasoline filling station in the northeast corner of the site from 1961 to 1976. All the structures at the site were razed between 2008 and 2017 and the vacant land was most recently used for gardening. Site redevelopment is scheduled to begin in 2025 and will include a multi-family apartment building with subgrade parking, surface parking, and landscape features. On November 12, 2024, the DNR was notified of a hazardous substance discharge at the site suspected to be related to site-wide historical urban fill material. Site investigation activities to-date have identified polycyclic aromatic hydrocarbons (PAHs) and RCRA metals, including arsenic and lead, in the soils and/or groundwater at the site.

Proposed Scope of SIWP

In summary, Fehr Graham proposes the following additional site investigation activities:

- To further investigate lead impacts, three soil borings (SB-7 to SB-9) will be advanced to approximately 48 feet below ground surface (ft bgs) surrounding SB-2. Samples will be collected from 0-4 ft bgs, 4-8 ft bgs, 8-12 ft bgs, 40-42 ft bgs, and at the boring's terminus, and will be analyzed for PAHs and lead.
- To further investigate potential contamination from the gas station operations formerly located on the northeast corner of the 700 Grand Avenue parcel, one soil borings (SB-10) will be advanced to approximately 48 ft bgs. Samples will be collected from 0-4 ft bgs, 4-8 ft bgs, 8-12 ft bgs, 38-40 ft bgs, and at the boring's terminus, and will be analyzed for petroleum volatile organic compounds (PVOCs) plus naphthalene, PAHs, and lead.

- To further investigate lead impacts, two soil borings (SB-11 and SB-12) will be advanced adjacent to SB-5. Samples will be collected from 0-4 ft bgs, 4-8 ft bgs, and 8-12 ft bgs, and will be analyzed for lead.
- Soil borings SB-7 to SB-10 will be converted into small-diameter 1-inch groundwater monitoring wells and will be developed in accordance with Wis. Admin. Code ch. NR 141. Another round of groundwater samples will be collected from monitoring well locations SB-1 to SB-10 and analyzed for PAHs and lead. SB-10 will also be analyzed for PVOCs plus naphthalene. Wells will be kept in place in case an additional round of sampling is required prior to development activities.
- To assess soil for potential reuse during redevelopment, sixteen soil borings (CS-1 to CS-17) will be advanced to 12 ft bgs from within the planned building footprint in a 30 ft grided pattern. Samples will be collected from 0-4 ft bgs, 4-8 ft bgs, and 8-12 ft bgs, and will be analyzed for VOCs, PAHs, RCRA metals, and polychlorinated biphenyls (PCBs). Feher Graham indicates that soil below Wis. Admin. Code ch. NR 720 residual contaminant levels (RCLs) will be reused as clean fill on- and/or off-site and soil above the RCLs will be disposed of at a licensed facility. A hand auger sample (HA-1) will be collected at 2 ft bgs from within a proposed overflow weir area and analyzed for VOCs, PAHs, RCRA metals, and PCBs.
- Prior to and during redevelopment activities, tank system site assessment(s) (TSSA(s)) will be completed by Feher Graham, in accordance with Wis. Admin. Code Ch. ATCP 93, as may be appropriate.

Review of the SIWP

The DNR provides the following feedback concerning the work plan:

1. Soil samples collected from SB-7 to SB-12 should be sampled and analyzed for the full suite of VOCs in addition to PAHs and lead.
2. SB-10 should be placed closer to the former gasoline service station's gasoline dispenser islands and underground storage tank (UST) area on the 700 Grand Avenue parcel.
3. The DNR recommends that any TSSA(s) that are performed include base and sidewall soil sampling, as may be appropriate.
4. Groundwater samples collected from SB-1 to SB-10 should be sampled and analyzed for the full suite of VOCs in addition to PAHs and lead.
5. The results of the additional soil and groundwater investigation must be evaluated to determine whether vapor investigation and mitigation may be required for the future site building and off-site. You may reference DNR's guidance document RR-800, *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*, to perform a vapor screening evaluation using the data collected from the forthcoming site investigation activities.
6. An emerging contaminants evaluation was included within the SIWP in compliance with site investigation scoping requirements of Wis. Admin. Code §§ NR 716.07 and NR 716.09. The evaluation provided information pertaining to whether emerging contaminants, including PFAS, were historically or are presently produced, used, handled, or stored at the site. The DNR has reviewed the evaluation and agrees with Feher Graham's conclusion that sampling for PFAS or other emerging contaminants is not required at this time.

Next Steps

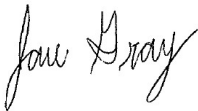
In consideration of administrative code requirements, the DNR is requesting the implementation of the following schedule:

- Site investigation activities must begin within 60 days after receiving DNR approval of the SIWP, per Wis. Admin. Code § NR 716.11(2r).

- Sampling results must be reported to the DNR on appropriately formatted data tables within 10 days of receiving the data, per Wis. Admin. Code § NR 716.14(2).
- Submit a comprehensive site investigation report (SIR) within 60 days after completion of the field investigation and receipt of laboratory data, per Wis. Admin. Code § NR 716.15, with its applicable review fee if you would like to request a DNR review and response. The Wis. Admin. Code ch. NR 724 remedial action plan (RAP) may be included with the SIR. The SIR and RAP should be submitted to the DNR for concurrence prior to initiating soil reuse on-site. An accurate delineation of soil contamination and type is necessary to ensure that all soil excavated as part of conducting a response action will be managed in a manner required by applicable law. Review the site investigation results to determine whether a materials management plan should be submitted alongside the SIR and RAP, per Wis. Admin. Code ch. NR 718.
 - When evaluating direct contact risk from soil contaminated by PAHs, you may want to consider conducting a cumulative cancer risk calculation to determine compliance with RCLs for carcinogenic PAHs (cPAHs). The DNR has a cumulative cancer risk calculator for cPAHs within the RCL Spreadsheet (RR-0151) available on our Contaminated Soils website:
<https://dnr.wisconsin.gov/topic/Brownfields/soil.html>.

The site investigation can be an iterative process. Site investigation activities may indicate that further assessment is needed to define the degree and extent of contamination. Until requirements are met, your site will remain “open”, and you are required to submit semi-annual progress reports, per Wis. Admin. Code § NR 700.11. The DNR appreciates the actions you are taking to restore the environment at this property. If you have any questions regarding this letter, please contact me, the DNR Project Manager, at (414) 435-8021 or by email at jane.gray@wisconsin.gov.

Sincerely,



Jane K. Gray
Hydrogeologist Program Coordinator
Remediation & Redevelopment Program

cc: Matt Dahlem, Fehr Graham Engineering & Environmental, mdahlem@fehrgraham.com
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